

P. O. Box 19123
BIRMINGHAM, ALABAMA 35219
(205) 942-1776
Fax: (205) 942-4814

"THE STATION WITH THE RIGHT TOUCH"

MM 99-25 ORIGINAL
RECEIVED
MAR 10 11 00 PM '99
EX PARTE OR LATE FILED

February 25, 1999

RECEIVED

NOV 01 1999

Commissioner Bill Kennard
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr. Kennard,

For the past 11 years, I have been the sole owner of WJLD Radio (1400 AM) in Birmingham, Alabama, serving the Birmingham market for 57 years. Thanks to relaxation of monopoly restrictions by the FCC, I now have to compete with conglomerates like Cox Radio, Dick Broadcasting and Capstar, which collectively, own or operate 16 stations in this market. I am writing to protest the planned initiation of low power FM's into this and other U.S. markets.

Now, please consider the plight of the lowest on the totem pole, the Class C (Old Class IV) AM station:

- * Being a Class C, I could not participate in the expanded band lottery although the expressed purpose of the expansion was to relieve the interference on the AM band.
- * Class C stations (1230, 1240, 1340, 1400, 1450, 1490), according to their FCC license, must accept interference.
- * I've included broadcast maps from 1945 and the present showing how our signal strength has eroded even though our power has quadrupled! I am in a five county reporting area with a signal that effectively covers one county.
- * We are looked upon as full timers but in reality, we're on the high end of the dial with low power in markets that have outgrown our signals.
- * There are some daytimers in this market with post-sunset authority that have better coverage than we do at night! Class C owners' hands are tied. 1,000 watts is all we'll ever get although daytimers get the opportunity to raise their daytime power.

No. of Copies rec'd 01
List ABCDE

With a relatively small investment, low power FM's would get better coverage than long standing Class C AM's that have served the community for generations. I am not opposed to low power FM stations because it would allow people to participate in radio but under the proposed guidelines, I would not be allowed to purchase one.

I have substantial investment in this station as do many Class C sole owners. This is a family business with a long history of community service. As Rep. Billy Tauzin (R-La) points out, these low power FM's would easily erode advertising revenue for older local AM's. Although the media reports that the move to low power FM is in response to market domination by media conglomerates, the proposal as currently constructed would severely hurt the small business AM owner who would be unable to compete on the FM band.

Small AM stations are already at a disadvantage. Both the actions of the previous FCC administration - as well as the current proposal - hurt Class C AM's more than any other entity. If you are truly interested in reversing the trend towards monopoly, we local owners would like to participate. It is not fair for the FCC to move ahead with low power FM until it remedies the condition of Class C AM's. It would only be fair to allow stand-alone Class C AM's the first crack at Low Power FM frequencies. Include us!

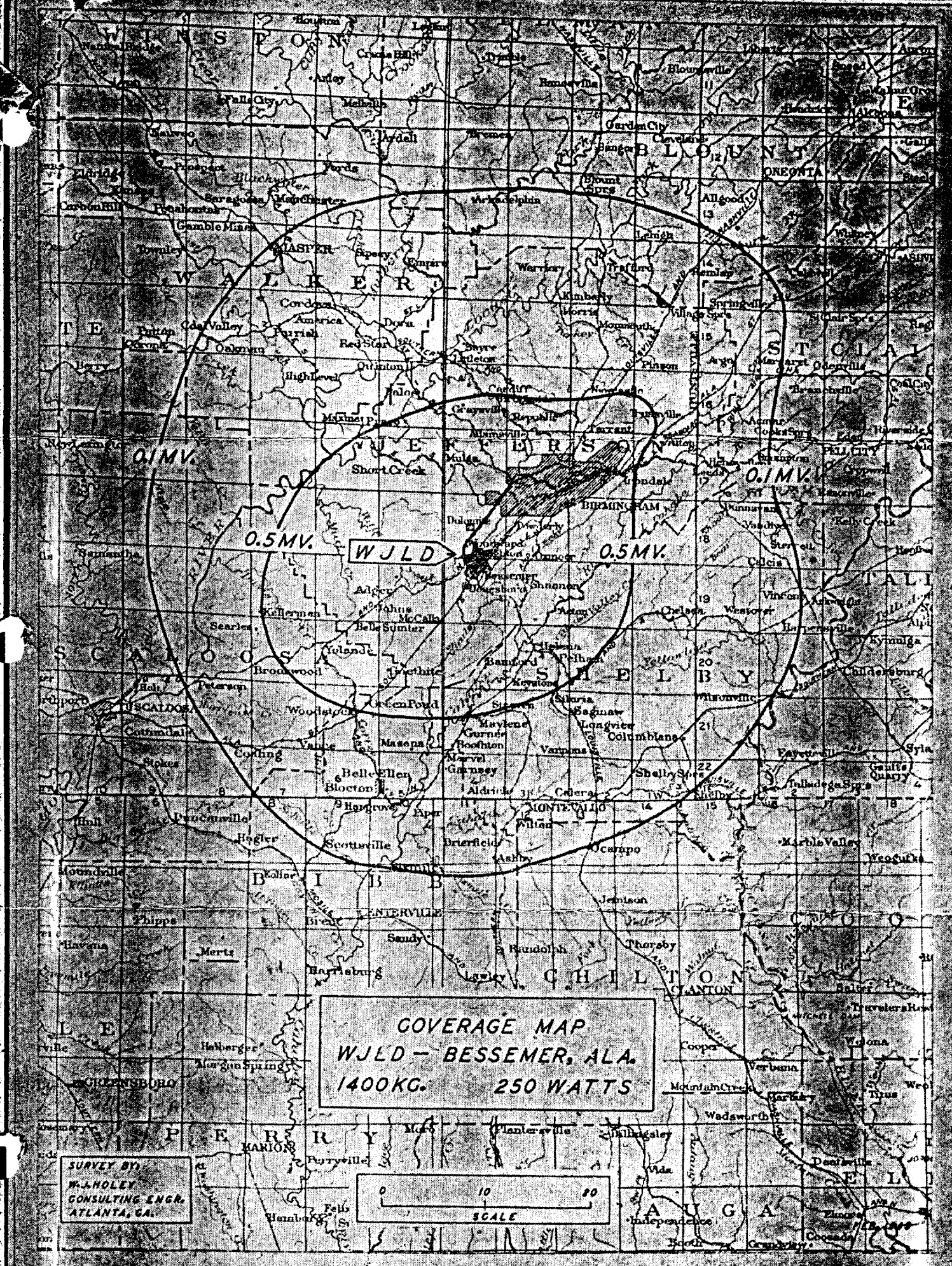
Sincerely,



Gary Richardson
Owner/GM

cc: Rep. Billy Tauzin

WANA	WWNT	WFPA	WFEB
WDNG	WDLK	WMGJ	WARF
WSMQ	WAJF	WKWL	WRLD
WEBJ	WAVD	WBHP	WNUZ
WTKI	WJHO	WMRK	WSBM



COVERAGE MAP
WJLD - BESSEMER, ALA.
1400 KG. 250 WATTS

SURVEY BY
W. A. HOLEY
CONSULTING ENGR.
ATLANTA, GA.

